

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
EASTERN DIVISION

In re
Philip I. Stepanian
Debtor

Chapter 7
No. 15-10780-FJB

MOTION TO EXTEND TIME TO OBJECT TO DEBTOR'S GENERAL DISCHARGE
AND TO DISCHARGE OF DEBT

Now come Wilbur J. Babin (hereinafter "Babin"), as he is trustee in bankruptcy of George Joseph Porter, Jr. (hereinafter "Porter") David R. Batiste, Jr. (hereinafter "Batiste"), and Brian Stoltz (hereinafter "Stoltz"), John O. Pieksen, Jr., Esq. and the law firm of John Pieksen & Associates, LLC (hereinafter jointly referred to as ("Pieksen"), and Ronnie G. Penton, Esq. (hereinafter "Penton"), and Porter, Batiste, Stoltz, LLC (hereinafter "PBS") (all of Babin, Pieksen, Penton, and PBS are hereinafter referred to as the "Movants") and object to the Debtor's discharge pursuant to 11 U.S.C. § 707 and to the Debtor's discharge of debt owed to the Movants pursuant to 11 U.S.C. § 523, stating in support thereof:

1. The Debtor filed a petition for relief under Chapter 7 of the Bankruptcy Code on March 4, 2015.
2. Each of Porter, Batiste, and Stoltz are musicians conducting business under the name of in Louisiana
3. Movants are the holders of various claims reduced to judgments and the subject of not less than four separate opinions issued in 2013 and 2014 in the federal courts in the State of Louisiana arising from the actions of the Debtor and his wholly owned entity Highsteppin Productions, LLC (hereinafter "Highsteppin") based primarily upon activities of the Debtor and Highsteppin in the years up to 2010.
4. The deadline for objection to the Debtor's discharge is currently Monday June 8, 2015.
5. Movants believe that they have one or more bases upon which to object to the Debtor's discharge and/or discharge of the debt owed to them. However most of the information pre-dates the bankruptcy petitions filed by Porter, Stoltz, and Batiste.
6. Movants intend to file a request in the immediate future for 2004 Examinations of at least the Debtor and Ira Stepanian and to request each of the deponents produce documents not previously produced and created in part at least after conduct of

discovery in the Louisiana litigation. Due to the time that deponents will have under the Rules of Procedure to supply documents to Movants' counsel, the additional time required by counsel to review the documents, conduct the Examinations, receive and review the transcripts of the Examinations, and then confer with the Movants, Movants believe an extension of time of up to 90 days to object to the Debtor's discharge and the discharge of the Debtor's debt to Movants is therefore warranted.

WHEREFORE Wilbur J. Babin, as he is trustee in bankruptcy of George Joseph Porter, Jr. David R. Batiste, Jr. and Brian Stoltz, John O. Pieksen, Jr., Esq. and the law firm of John Pieksen & Associates, LLC, and Ronnie G. Penton, Esq. and Porter, Batiste, Stoltz, LLC pray that this court extend the time for them to object to the Debtor's discharge pursuant to 11 U.S.C. § 707 and to the Debtor's discharge of debt owed to the Movants pursuant to 11 U.S.C. § 523 be extended from June 8, 2015 to and including Friday, September 4, 2015.

By their attorney

/s/ David M. Nickless

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CERTIFICATE OF SERVICE

I, David M. Nickless, do hereby certify that I will immediately upon receipt of the notice of electronic service, serve a copy of the within pleading by mailing the same to any of the parties listed below not noted as having received electronic service.

United States Trustee
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Via ECF

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Looney & Grossman
101 Arch Street
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Counsel to Debtor – Via ECF

Philip I Stepanian
30 Bates Road
Arlington, MA 02474
Debtor

Dated: June 5, 2015

/S/ David M. Nickless

David M. Nickless